

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	No. 1:18-CR-457-AJT
BIJAN RAFIEKIAN, et al.,	)	
	)	
<u>Defendants.</u>	)	

MOTION FOR LEAVE TO ENTER A SPECIAL APPEARANCE  
ON BEHALF OF KAMIL EKIM ALPTEKIN

Counsel for Kamil Ekim Alptekin hereby move the Court for an order granting leave to appear specially on Mr. Alptekin's behalf for the limited purpose of opposing the Government's Motion to Establish Crime Fraud Exception filed on May 31, 2019.<sup>1</sup> If the Court grants the instant motion, counsel request that it deem the attached opposition filed. A memorandum in support of this motion is filed herewith.

Respectfully submitted this 6<sup>th</sup> day of June 2019.

By: /s/ Rodney F. Page  
Rodney F. Page (Virginia Bar No. 12401)  
Jennifer Kies Mammen (Virginia Bar No. 73102)  
**BRYAN CAVE LEIGHTON PAISNER LLP**  
1155 F Street, N.W.  
Suite 700  
Washington, D.C. 20004  
Telephone: (202) 508-6000  
Facsimile: (202) 508-6200  
Rodney.Page@bclplaw.com  
Jennifer.Mammen@bclplaw.com

*Attorneys for Specially-Appearing Defendant  
Kamil Ekim Alptekin*

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<sup>1</sup> This motion, and any special appearance by Mr. Alptekin, if permitted, is made without prejudice to any other defenses, procedural or substantive, all of which are reserved.

CERTIFICATE OF SERVICE

I hereby certify that on the 6<sup>th</sup> day of June 2019, I electronically filed the foregoing document entitled "MOTION FOR LEAVE TO ENTER A SPECIAL APPEARANCE ON BEHALF OF KAMIL EKIM ALPTEKIN" with the Clerk of Court using the CM/ECRF system, which will then send a notification of such filing to the counsel named below:

James P. Gillis  
John T. Gibbs  
Assistant United States Attorneys  
**UNITED STATES ATTORNEY'S OFFICE**  
2100 Jamieson Avenue  
Alexandria, VA 22314  
Telephone: (703) 299-3700  
Facsimile: (703) 299-3982  
James.P.Gillis@usdoj.gov  
John.Gibbs@usdoj.gov

Evan N. Turgron  
Trial Attorney  
Counterintelligence and Export Control  
Section  
National Security Division  
**UNITED STATES DEPARTMENT OF JUSTICE**  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530  
Telephone: (202) 353-0176  
Evan.Turgeon@usdoj.gov

*Attorneys for the United States of America*

Robert Powel Trout  
**TROUT CACHERIS & SOLOMON, PLLC**  
1627 Eye St. N.W.  
Suite 1130  
Washington, DC 20006  
Telephone: (202) 464-3300  
Facsimile: (202) 463-3319  
rtrout@troutcacheris.com

James Edward Tysse  
**AKIN GUMP STRAUSS HAUER & FELD LLP**  
Robert S. Strauss Tower  
2001 K Street NW  
Washington, DC 20006  
Telephone: (202) 887-4571  
Facsimile: (202) 887-4288  
jtysse@akingump.com

*Attorneys for Bijan Rafiekian*

By: /s/ Rodney F. Page  
Rodney F. Page (Virginia Bar No. 12401)  
**BRYAN CAVE LEIGHTON PAISNER LLP**  
1155 F Street, N.W.  
Suite 700  
Washington, D.C. 20004  
Telephone: (202) 508-6000  
Facsimile: (202) 508-6200  
Rodney.Page@bclplaw.com

*Attorney for Specially-Appearing Defendant  
Kamil Ekim Alptekin*